

# Exhibit “I”

Troi A. Bryant

	Page 1		Page 3
1	IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION	1	I N D E X
2		2	PAGE
3	ARTIS ELLIS, :	3	
4	Plaintiff, :	4	APPEARANCES..... 2
5	:	5	
6	Vs. : CIVIL ACTION NO. EDUCATIONAL COMMISSION : 4:14-cv-02126	6	WITNESS: TROI A. BRYANT
7	FOR FOREIGN MEDICAL :	7	
8	GRADUATES, :	8	
9	Defendant. :	9	EXAMINATION BY MS. O'DRISCOLL ..... 6
10	*****	10	
11	VIDEOTAPED / REALTIMED DEPOSITION OF TROI A. BRYANT	11	EXAMINATION BY MS. HARROLD ..... 85
12	SEPTEMBER 8, 2016	12	FURTHER EXAMINATION BY MS. O'DRISCOLL ..... 90
13	*****	13	FURTHER EXAMINATION BY MS. HARROLD ..... 93
14	VIDEOTAPED / REALTIMED DEPOSITION of TROI A.	14	FURTHER EXAMINATION BY MS. O'DRISCOLL ..... 95
15	BRYANT, produced as a witness at the instance of the	15	FURTHER EXAMINATION BY MS. HARROLD ..... 101
16	Defendant, and duly sworn, was taken in the	16	
17	above-styled and numbered cause on Thursday, the 8th	17	
18	day of September, 2016, from 11:18 a.m. to 1:09 p.m.,	18	CHANGES AND SIGNATURE..... 103
19	before Pat English-Arredondo, CSR, RMR, CRR in and for	19	
20	the State of Texas, reported by machine shorthand in	20	REPORTER'S CERTIFICATE..... 104
21	realtime translation, at the law offices of Morgan,	21	
22	Lewis & Bockius, LLP, 1000 Louisiana Street,	22	
23	Suite 4000, Houston, Texas, pursuant to the Federal	23	
24	Rules of Civil Procedure; that the Witness will read	24	
25	the deposition.	25	
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1	A P P E A R A N C E S	1	E X H I B I T S I N D E X
2	COUNSEL FOR PLAINTIFF ARTIS ELLIS:	2	VIDEOTAPED / REALTIMED DEPOSITION OF
3	Ms. Keenya R. Harrold	3	TROI A. BRYANT
4	KENNARD	4	SEPTEMBER 8, 2016
5	2603 Augusta Drive, 14th Floor	5	NOS.
6	Houston, Texas 77057	6	NUMBER DESCRIPTION PAGE
7	Phone: 713.742.0900	7	EXHIBIT 1 Subpoena issued to Mr. Bryant, 9
8	e-mail: keenya.harrold@kennardlaw.com	8	with attachments, 8 pages
9	COUNSEL FOR DEFENDANT EDUCATIONAL COMMISSION FOR	9	EXHIBIT 2 Personnel files for Mr. Bryant 49
10	FOREIGN MEDICAL GRADUATES:	10	at ECFMG, top document titled
11	Ms. Erin E. O'Driscoll	11	"Notice to All Standardized
12	MORGAN, LEWIS & Bockius, LLP	12	Patients and Acknowledgement
13	1000 Louisiana, Suite 4000	13	of Receipt," dated 11-3-08 and
14	Houston, Texas 77002	14	signed by Troi Bryant, Bates
15	Phone: 713.890.5000	15	Nos. ECFMG-ELLIS 007267 - 239
16	e-mail: codriscoll@morganlewis.com	16	EXHIBIT 3 ECFMG Personnel Information 63
17	ALSO PRESENT:	17	Change Form, Bates ECFMG-ELLIS
18	Ms. Artis Ellis	18	007235 - 223
19	VIDEOGRAPHER:	19	EXHIBIT 4 Clinical Skills Evaluation 68
20	Mr. Jamie Rodgers	20	Collaboration (CSEC)
21	COURT REPORTER:	21	Ownership, Confidentiality,
22	Ms. Pat English-Arredondo, CSR, RMR, CRR, CLR	22	and Non-Disclosure Agreement,
23		23	Bates ECFMG-ELLIS 007227-7231
24		24	
25		25	

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11:25:33 1	Q. And then also, as you know, you're under oath	11:27:36 1	A. Jacquelyn.		
11:25:36 2	today as if you're testifying before a judge and jury	11:27:39 2	Q. And how long have you been married to her?		
11:25:38 3	and you understand that that's under penalty of	11:27:42 3	A. 27, 28 years.		
11:25:41 4	perjury?	11:27:48 4	Q. And have you ever been married before that?		
11:25:41 5	A. Yes, ma'am.	11:27:49 5	A. No.		
6	Q. Okay, great.	11:27:49 6	Q. And do you have any children?		
11:25:52 7	And when you said just a moment ago, when	11:27:50 7	A. Yes.		
11:25:53 8	I asked you about what this lawsuit was about, you said	11:27:51 8	Q. And how many children do you have?		
11:25:56 9	you had a vague knowledge about that.	11:27:53 9	A. Three.		
11:25:58 10	A. Uh-huh.	11:27:54 10	Q. And what are their names?		
11:25:58 11	Q. You referenced that it was -- that it was	11:27:55 11	A. Brittani, Troi and Ervin.		
11:26:03 12	your understanding that it was about your relationship	11:28:00 12	Q. And how old are they?		
11:26:04 13	with Ms. Artis Ellis.	11:28:01 13	A. 29, 22 and 20.		
14	A. Uh-huh.	11:28:13 14	Q. And --		
11:26:05 15	Q. How did you know that?	11:28:13 15	A. Or 19. He will be 20 soon.		
11:26:10 16	A. I'm not sure. I don't remember how I know	11:28:16 16	Q. Sorry. Who will be --		
11:26:12 17	that. I just know that.	11:28:17 17	A. My youngest will be 20 in October.		
11:26:13 18	Q. Was it through talking with Ms. Keenya	11:28:22 18	Q. And what are their last names?		
11:26:15 19	Harrold?	11:28:24 19	A. Bryant.		
11:26:16 20	A. It could have been --	11:28:26 20	Q. And who are the mothers of those children?		
21	Q. Okay.	11:28:29 21	Mother or mothers?		
11:26:16 22	A. -- part of that conversation, I guess. I'm	11:28:30 22	A. Jacquelyn is the mother of Troi and Ervin,		
11:26:18 23	not sure.	11:28:35 23	and Artis is the mother of Brittani.		
11:26:19 24	Q. And do you remember anything else that might	11:28:37 24	Q. Okay. When did you meet Artis Ellis?		
11:26:21 25	have been discussed about the relationship with	11:28:51 25	A. 20-plus years ago. 28 years ago, 29 years		
Page 14				Page 16	
11:26:25 1	Ms. Keenya or anybody else in her office?	11:28:54 1	ago, something.		
11:26:31 2	A. No, I haven't spoken to anyone else in her	11:28:54 2	Q. Okay. And how did you meet Ms. Ellis?		
11:26:34 3	office.	11:29:01 3	A. I can't recall exactly how I met her. I'm		
11:26:34 4	Q. Have you spoken with Ms. Artis Ellis at any	11:29:04 4	not sure. Kind of like knew the same people, I guess.		
11:26:37 5	time in the last two years prior to coming today, this	11:29:07 5	Q. Did you-all go to school together?		
11:26:41 6	morning?	11:29:12 6	A. Not really.		
11:26:41 7	A. On occasion. During the holidays, I guess.	11:29:13 7	Q. I mean --		
11:26:44 8	Q. Okay. And is that normal, for you-all to	11:29:14 8	A. We attended the same school, but we didn't go		
11:26:50 9	talk during the holidays?	11:29:16 9	to school together.		
11:26:52 10	A. Well, at least text or -- yeah.	11:29:17 10	Q. But you attended the same school?		
11	Q. Okay.	11:29:19 11	A. I'm older than her, so I think I was gone		
12	A. Yes.	11:29:22 12	already. I'm not sure how much older I am than her. I		
11:27:04 13	Q. And do you-all text each other back pretty	11:29:26 13	vaguely remem -- I didn't know her very well. When we		
11:27:06 14	freely?	11:29:28 14	were young people, I didn't know her very well.		
11:27:07 15	A. I'm not sure what you mean by that.	11:29:30 15	Q. Okay. So you said you went to school -- but		
11:27:08 16	Q. Well, how often? What's a normal week for	11:29:32 16	you did attend the same schools?		
11:27:11 17	you-all to communicate as far as number of times?	11:29:34 17	A. Yes.		
11:27:13 18	A. It wouldn't be weekly. I would say	11:29:35 18	Q. Was it high school?		
11:27:16 19	seasonally during the holidays.	11:29:35 19	A. High school, yes.		
11:27:17 20	Q. So during any of the holidays?	11:29:36 20	Q. What about middle school?		
11:27:20 21	A. Christmas, Thanksgiving, New Year. Happy New	11:29:37 21	A. No. Not that I know of.		
11:27:23 22	Year's.	11:29:39 22	Q. What about college?		
11:27:24 23	Q. Okay. Mr. Bryant, are you currently married?	11:29:40 23	A. No.		
11:27:34 24	A. Yes.	11:29:44 24	Q. Elementary school?		
11:27:34 25	Q. And what is your wife's name?	11:29:45 25	A. No.		

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11:29:49	1	Q.	And what high school did you attend?	11:32:08	1	be -- if she was -- was she born in March of 1987?	
11:29:53	2	A.	Ross Shaw Sterling.	11:32:12	2	A. She was born in March of '87, so just	
11:29:56	3	Q.	And did you attend that school for all four years of high school?	11:32:17	3	previous, the previous year, a few months. So it was	
11:29:58	4	A.	Yes.	11:32:21	4	nine months. I don't remember the month. We can do	
11:29:58	5	Q.	You said that you and Artis knew some of the same people.	11:32:24	5	the math. It was nine months before that. I don't	
11:30:02	6	A.	I would imagine because we went to the same -- yes, I'm sure we did.	11:32:27	6	know.	
11:30:03	7	Q.	Okay. .	11:32:27	7	Q. Okay. And do you remember -- I know you said	
11:30:06	8	A.	I'm not sure who they were, but...	11:32:30	8	you went to the same high school and that you-all knew	
11:30:08	9	Q.	You don't remember their names?	11:32:32	9	some of the same people. But do you remember how you	
11:30:11	10	A.	No, no.	11:32:34	10	met her, how you met Ms. Ellis, back during that spring	
11:30:12	11	Q.	You think that you may be a year or two older than her?	11:32:39	11	time frame when you had the sexual encounter?	
11:30:14	12	A.	At least.	11:32:42	12	A. Are you asking me for an event or something?	
11:30:17	13	Q.	And did you-all attend the same church?	11:32:46	13	Q. Well, how you met her. I'm just wondering,	
11:30:20	14	A.	No.	11:32:48	14	did friends introduce you? Did you see her in the	
11:30:23	15	Q.	And did you and Ms. Ellis ever date?	11:32:52	15	hallway? Do you remember?	
11:30:26	16	A.	No.	11:32:52	16	A. No, I don't. I think it was at a party or	
11:30:28	17	Q.	Did you ever have any romantic involvement at all?	11:32:56	17	something. I'm not sure.	
11:30:37	18	A.	One encounter.	11:32:58	18	Q. Okay. You think you met her at a party?	
11:30:42	19	Q.	Okay. And when you say "once," was that one period of time? Was that --	11:33:02	19	A. I don't remember. I don't recall.	
11:30:44	20	A.	Sexual encounter, yes.	11:33:04	20	Q. Okay.	
11:30:46	21	Q.	Was it -- you said it was -- you said Brittani is 29 years old. And that's currently, right?	11:33:05	21	A. I have no idea where I met her.	
11:30:46	22	A.	Yeah. I think she is, yes.	11:33:07	22	Q. Did you-all go to the prom together?	
11:30:46	23	Q.	And was she born in -- was it 1987?	11:33:09	23	A. No. Actually, I went with someone else.	
11:30:46	24	A.	Yes.	11:33:12	24	Q. Okay. And do you remember if the sexual	
11:30:50	25	Q.	And how long was that romantic involvement?	11:33:15	25	encounter with Ms. Artis was before, during or after	
				Page 18		Page 20	
11:30:54	1	Q.	Okay. And when was that?	11:33:18	1	the prom?	
11:30:57	2	A.	I don't recall exactly when it was, but just prior to my daughter being conceived.	11:33:19	2	A. It was later that -- yeah. Later that night,	
11:31:03	3	Q.	Okay.	11:33:23	3	yeah.	
11:31:06	4	A.	Yeah, but I don't know dates and times.	11:33:24	4	Q. And where was that?	
11:31:07	5	Q.	Okay. So you -- when you say "once," was that one period of time? Was that --	11:33:26	5	A. What do you mean?	
11:31:08	6	A.	One encounter.	11:33:27	6	Q. Location-wise, geographically, where was	
11:31:11	7	Q.	Okay. And when you say "encounter," you mean sexual encounter?	11:33:29	7	that?	
11:31:14	8	A.	Sexual encounter, yes.	11:33:30	8	A. In Houston.	
11:31:16	9	Q.	Was it -- you said it was -- you said Brittani is 29 years old. And that's currently, right?	11:33:33	9	Q. Okay. Was it in a house? Was it in a	
11:31:19	10	A.	Yeah. I think she is, yes.	11:33:35	10	school?	
11:31:20	11	Q.	And was she born in -- was it 1987?	11:33:37	11	A. It was --	
11:31:23	12	A.	MS. HARROLD: Objection, relevance.	11:33:37	12		
11:31:24	13	Q.	And so you and Ms. Artis -- and when was this romantic involvement?	11:33:38	13	A. Yeah, I'm not sure where you're going. I'm	
11:31:27	14	A.	What do you mean by "when"?	11:33:42	14	sure it was in a house, but I don't know exactly the	
11:31:29	15	Q.	Was it -- you said it was -- you said Brittani is 29 years old. And that's currently, right?	11:33:45	15	details.	
11:31:35	16	A.	(By Ms. O'Driscoll) Okay. After that house,	11:33:45	16	Q. (By Ms. O'Driscoll) Okay. After that house,	
11:31:36	17	Q.	And so does -- do you know when you were romantically involved? Was it just prior to Brittani being born?	11:33:47	17	did you -- you said that you-all had sex. Did you talk	
11:31:37	18	A.	Yeah. I think she is, yes.	11:33:52	18	to her the next day?	
11:31:45	19	Q.	And so does -- do you know when you were romantically involved? Was it just prior to Brittani being born?	11:33:56	19	A. I don't remember. I'm not sure.	
11:31:45	20	A.	It was in spring of that year, I guess. I don't remember exactly.	11:33:59	20	Q. Well, do you remember talking to her after	
11:31:47	21	Q.	Okay. When you say "that year," would that	11:34:02	21	that evening of the prom?	
11:31:51	22	A.	Oh, yeah.	11:34:03	22	A. And how often would you talk to her?	
11:31:52	23	Q.	When she told me she was pregnant.	11:34:05	23	A. When she told me she was pregnant.	
11:32:05	24	A.	Okay.	11:34:08	24	Q. Okay.	
11:32:07	25	Q.		11:34:10	25		

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12:54:34	1	A. Yes.	12:56:17	1 part-time position. Is that correct?
12:54:34	2	Q. And Jackie worked with you, also, and	12:56:19	2 A. That's correct.
12:54:36	3	Ms. Ellis --	12:56:20	3 Q. And do you remember reporting to Ms. Ellis
	4	A. Yes.	12:56:23	4 when you were working part-time?
12:54:37	5	Q. -- to raise Brittani?	12:56:26	5 MS. O'DRISCOLL: Objection, asked and
12:54:38	6	A. Yes.	12:56:28	6 answered.
12:54:38	7	Q. Have you understood all of my questions, sir?	12:56:28	7 A. No, I remember reporting to the trainer and
12:54:59	8	A. I think I have.	12:56:32	8 John. That's what I remember.
	9	Q. Okay.	12:56:33	9 Q. (By Ms. Harrold) And you testified that
12:55:01	10	A. I've tried to.	12:56:35	10 Ms. Ellis did not interview you for the promotion,
12:55:01	11	Q. Okay.	12:56:37	11 right? It was someone in Philadelphia?
12:55:04	12	MS. O'DRISCOLL: I will pass the	12:56:42	12 MS. O'DRISCOLL: Objection, form.
12:55:06	13	witness.	13	A. That's true.
12:55:06	14	(Following proceeding commenced at 12:55 p.m.)	12:56:43	14 MS. O'DRISCOLL: Mischaracterizes
12:55:08	15	EXAMINATION	12:56:43	15 evidence.
	16	BY MS. HARROLD:	12:56:44	16 Q. (By Ms. Harrold) Also, in regards to the
12:55:11	17	Q. Hi, Mr. Bryant. How are you?	12:56:46	17 promotion, you found out about that promotion
12:55:13	18	A. Tired.	12:56:49	18 from -- did you find out from your wife? Or how did
12:55:15	19	Q. I understand, and I'm not going to try to	12:56:52	19 you find out about that promotion opportunity as a
12:55:17	20	keep you here very long. But my name is Keenya	12:56:56	20 trainer?
12:55:19	21	Harrold. I represent Ms. Ellis in the legal matter	12:56:56	21 A. Through the other trainers.
12:55:22	22	against ECFMG.	12:56:58	22 Q. So Ms. Ellis did not encourage you or tell
12:55:23	23	I'm going to ask you a couple of	12:57:00	23 you about that position. Is that right?
12:55:25	24	questions, follow-up questions, but I understand that	12:57:03	24 A. No.
12:55:28	25	you have to get back to work.	12:57:05	25 Q. Were you terminated from ECFMG?
		Page 86		Page 88
12:55:31	1	A. Uh-huh.	12:57:08	1 A. No.
12:55:32	2	Q. Let me first apologize for even you having to	12:57:10	2 Q. So you were not terminated for not listing
12:55:34	3	take out time to come down here and do a deposition,	12:57:12	3 Ms. Ellis on your application as a relative. Is that
12:55:40	4	one, about a one-night-stand that happened when you	12:57:16	4 right?
12:55:43	5	were 19 years old and a relationship with your daughter	12:57:16	5 A. No.
12:55:45	6	that had nothing to do with your employment. So I	12:57:17	6 Q. And you were not terminated for not telling
12:55:48	7	apologize for making you come downtown.	12:57:21	7 John about Brittani. Is that right?
12:55:49	8	A. Thank you.	12:57:22	8 A. No.
12:55:49	9	MS. O'DRISCOLL: Objection, form.	12:57:24	9 Q. In fact, what caused you to leave ECFMG?
12:55:52	10	Assumes facts in evidence and mischaracterizes	12:57:27	10 A. I resigned.
12:55:52	11	evidence.	12:57:29	11 Q. And what caused you to resign?
12:55:53	12	Q. (By Ms. Harrold) During our five-minute	12:57:31	12 A. I was going back to industry. I had a better
12:55:54	13	conversation on yesterday you remember that I told you	12:57:35	13 opportunity.
12:55:56	14	just to be honest in your deposition. Correct?	12:57:37	14 Q. And you listed Jackie on your application
12:55:58	15	A. Yes.	12:57:40	15 because she was your wife. Right?
12:55:59	16	Q. And I told you that the phone call was not to	12:57:42	16 A. Yes.
12:56:00	17	persuade you in any way. Is that right?	12:57:43	17 Q. So you consider your wife your relative. Is
12:56:04	18	A. Yes, ma'am.	12:57:46	18 that right?
12:56:04	19	Q. You testified earlier that you found out	12:57:46	19 A. Yes, yes.
12:56:07	20	about the part-time position from your wife. Is that	12:57:49	20 Q. Are you and Ms. Ellis relatives?
12:56:10	21	correct?	12:57:51	21 A. No, we're not.
12:56:10	22	A. Yes.	12:57:52	22 Q. Were you guys ever married?
12:56:11	23	Q. Not from Ms. Ellis?	12:57:54	23 A. No.
12:56:13	24	A. I did not, yes.	12:57:55	24 Q. In a domestic partnership of any kind?
12:56:14	25	Q. And Ms. Ellis did not interview you for that	12:57:58	25 A. No.

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12:57:59 1	Q. Are you guys related by blood?	12:59:30 1	A. Right.	
12:58:01 2	A. No.	12:59:30 2	Q. -- you testified that you then interviewed	
12:58:02 3	Q. Adoption?	12:59:32 3	with Ms. Ellis to receive that promotion. Correct?	
12:58:02 4	A. No.	12:59:35 4	A. Brent and Ms. Ellis, according to this	
12:58:06 5	Q. So she's never been your spouse?	12:59:39 5	(indicating).	
12:58:08 6	A. No.	12:59:39 6	Q. And you testified, in fact, that you recalled	
12:58:09 7	Q. She definitely is not your child, right?	12:59:42 7	interviewing with Ms. Ellis for that promotion,	
12:58:11 8	A. No, no.	12:59:44 8	correct?	
12:58:12 9	Q. Not your grandchild?	12:59:45 9	A. Brent and Ms. Ellis, yes.	
12:58:13 10	A. No.	12:59:46 10	Q. But Ms. Ellis was there?	
12:58:14 11	Q. Not your parent?	12:59:47 11	A. Yes.	
12:58:15 12	A. No.	12:59:48 12	Q. And to your knowledge, she approved the	
12:58:16 13	Q. Grandparent?	12:59:50 13	promotion. Correct?	
12:58:17 14	A. No.	12:59:51 14	A. I would assume so.	
12:58:17 15	Q. Are you and Ms. Ellis siblings?	12:59:54 15	Q. Well, I mean, based on the paperwork that we	
12:58:20 16	A. No.	12:59:56 16	looked at, she signed off as your supervisor, didn't	
12:58:20 17	Q. Are you her uncle?	01:00:02 17	she?	
12:58:22 18	A. No.	01:00:03 18	A. Okay, yeah, sure.	
12:58:22 19	Q. Is she your aunt?	01:00:04 19	Q. You also mentioned that you and Ms. Ellis	
12:58:23 20	A. No.	01:00:09 20	were co-parenting Brittani throughout her childhood --	
12:58:24 21	Q. What about, is she your niece?	01:00:14 21	A. Yes.	
12:58:26 22	A. No.	01:00:14 22	Q. -- and throughout growing up and throughout	
12:58:26 23	Q. Are you her nephew?	01:00:17 23	college, correct?	
12:58:27 24	A. No.	01:00:17 24	A. Sure.	
12:58:28 25	Q. Are you guys cousins?	01:00:19 25	Q. I mean, is that correct?	
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12:58:29 1	A. No.	01:00:20 1	A. Yes.	
12:58:30 2	Q. Have you guys ever lived together?	2	Q. Okay.	
12:58:32 3	A. No.	01:00:22 3	A. I've never ceased my relationship with my	
12:58:32 4	Q. In an intimate, personal committed	01:00:25 4	daughter.	
12:58:35 5	relationship?	01:00:25 5	Q. Okay. And that relationship with your	
12:58:36 6	A. No.	01:00:26 6	daughter was also tied to Ms. Ellis because that was	
12:58:36 7	Q. Were you guys in a relationship when you guys	01:00:29 7	her mother, correct?	
12:58:38 8	were teenagers?	01:00:31 8	A. Not as an adult. No, that wouldn't be true	
12:58:39 9	A. No.	01:00:35 9	as an adult. My daughter was away at college. I had	
12:58:41 10	Q. Were you ever engaged to be married?	01:00:39 10	very little interaction with Ms. Ellis.	
12:58:43 11	A. No.	01:00:41 11	Q. Well, you texted her on holidays and you	
12:58:44 12	Q. Do you consider Ms. Ellis to be your	01:00:43 12	talked with her on holidays. Correct?	
12:58:46 13	significant other?	01:00:44 13	A. That's not a relationship. To me, that's not	
12:58:47 14	A. No.	01:00:47 14	a relationship.	
12:59:03 15	MS. HARROLD: I will pass the witness.	01:00:49 15	Q. Do you text strangers?	
12:59:04 16	(Following proceeding commenced at 12:59 p.m.)	01:00:50 16	A. Absolutely not.	
12:59:05 17	FURTHER EXAMINATION	01:00:52 17	Q. So co-parenting with someone, that is a	
18	BY MS. O'DRISCOLL:	01:00:56 18	relationship, when you're co-parenting with someone,	
12:59:07 19	Q. Mr. Bryant, I just have a couple of follow-up	01:00:59 19	correct?	
12:59:09 20	questions.	01:00:59 20	A. Okay. Sure.	
12:59:10 21	Was Ms. Ellis involved in the orientation	01:01:01 21	Q. Do you agree with me?	
12:59:12 22	and the paperwork when you were hired?	01:01:02 22	A. Sure.	
12:59:14 23	A. I don't recall.	01:01:03 23	Q. And it would be also intimate to have a	
12:59:21 24	Q. After the Philadelphia person interviewed you	01:01:07 24	sexual encounter with someone, wouldn't it?	
12:59:25 25	for the promotion to trainer --	01:01:09 25	A. Oh, yes.	